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SUPERIOR COURT OF THE STATE OF CALIFORNIA**FOR THE COUNTY OF LOS ANGELES**BRANDEN BAGGOT, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

FOTO-KEM INDUSTRIES, INC., a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20STCV31051

[Hon. William F. Highberger]

**DECLARATION OF BRANDEN BAGGOT
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT***[Filed concurrently with Notice of Motion and
Motion for Final Approval of Class Action
Settlement; Memorandum of Points and
Authorities; Declaration of Larry W. Lee;
Declaration of Simon L. Yang; Declaration of
William L. Marder; Declaration of Jodey
Lawrence; [Proposed] Order]*

Date: November 18, 2021

Time: 11:30 a.m.

Department: 10

Complaint Filed: August 17, 2020

DECLARATION OF BRANDEN BAGGOT

I, Branden Baggot, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the matters stated in this declaration.

2. I worked for Foto-Kem Industries, Inc. as a non-exempt employee until I was furloughed in March of 2020. During my employment, I was paid on an hourly basis and routinely earned non-discretionary incentive wages such as shift premium wages. When sick leave was taken in workweeks that I earned non-discretionary incentive wages, it was paid at my base rate of pay rather than my regular rate of pay. I was underpaid sick pay wages and also was not paid the underpaid sick pay wages at the end of my employment.

3. I understand that this action was brought on behalf of other employees within the State of California. I also understand I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class, and that I will not settle out my claims separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

4. I have taken all necessary steps to represent the interests of the Class, including by providing information and documents to my counsel. Prior to and subsequent to filing this lawsuit, I regularly spoke to my attorneys to discuss the status of the case, to offer my input, and to assist in gathering evidence that supported the class claims. I also provided documents and other relevant information throughout the litigation in order to assist my attorneys in this matter.

5. I have and continue to be willing to assist in the investigation of this matter. I also have and continue to be willing to make myself available for trial or any further proceeding as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

3 7. I have discussed the terms of the settlement with my attorneys, and based on the
4 information provided, I believe the settlement to be fair, adequate, and reasonable. I believe it is an
5 excellent result for the Class. I am proud of the result and accomplishment of this lawsuit. I feel that it is
6 a positive accomplishment and understand that other people will benefit because of the actions that I
7 have taken. I believe that the settlement is fair, adequate, and reasonable for the Class.

8 8. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity
9 Law Group and 35% to Polaris Law Group.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed this 26th day of October 2021, at Los Angeles, California.

DocuSigned by:

 9AABFD15072D45F
 Brandon Baggot